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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

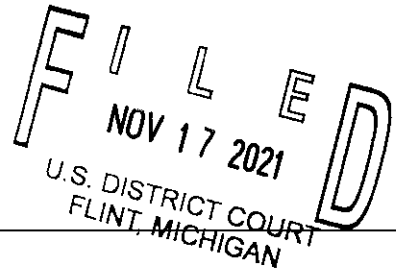
Case No.: 20-cr-20491

v .

Judge Thomas L. Ludington  
Magistrate Judge Patricia T. Morris

JUSTIN WILLIAM ZUBE,

Defendant.



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**FIRST SUPERSEDING INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT ONE**

**(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))  
(Possession of and Accessing with Intent to View Child Pornography  
Involving a Prepubescent Minor or a Minor Who Had Not  
Attained 12 Years of Age)**

On or about February 11, 2020, in the Eastern District of Michigan, Northern Division, the defendant JUSTIN WILLIAM ZUBE, having previously been convicted of an offense under Michigan law relating to the possession of child pornography, knowingly possessed, and accessed with intent to view, material that contained images of child pornography, as defined in Title 18, United States Code Section 2256, which involved a prepubescent minor or a minor who had not attained

12 years of age, and which had been mailed, or shipped or transported using any means or facility of interstate or foreign commerce, or in and affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18 United States Code, Sections 2252A(a)(5)(B) and (b)(2).

**FORFEITURE ALLEGATIONS**  
**(Criminal Forfeiture - 18 U.S.C. § 2253(a))**

The allegations contained in Count One of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253(a).

As a result of the foregoing Count One violation of Title 18, United States Code, Sections 2252A(a)(5) and (b)(2), the defendant shall forfeit:

(a) any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Specific property subject to forfeiture to the United States includes, but is not limited to, the following:

- One silver cellular telephone COOLPAD;
- One cellular telephone LGL158VL, serial # 712CQFT0101323;
- One cellular telephone LGLM-X420MM, IMEI 359952101453643; and
- One laptop computer Hewlett-Packard, serial # 5CG2501PRH.

**Substitute Assets.** Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), defendant shall forfeit substitute property, up to the value of the property described above, if, by any act or omission of the defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

**THIS IS A TRUE BILL.**

Dated: November 17, 2021

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

SAIMA S. MOHSIN  
Acting United States Attorney

s/Anthony P. Vance

ANTHONY P. VANCE  
Assistant United States Attorney  
Chief, Branch Offices

s/Anca I. Pop

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s/William J. Vaillencourt, Jr.

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**Companion Case information MUST be completed by AUSA and initialed.**

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	<b>Case Number</b> 20-cr-20491
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: AIP

Case Title: USA v. Justin William ZubeCounty where offense occurred : BayCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty☐ Indictment/ ☐ Information --- no prior complaint.☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**Superseding to Case No: 20-cr-20491Judge: Thomas L. Ludington

- ☐ Original case was terminated; no additional charges or defendants.
- ☒ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

November 17, 2021

Date

s/Anca I. Pop

Anca I. Pop  
 Assistant United States Attorney  
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 Telephone: (989) 895-5712  
 Email: Anca.Pop@usdoj.gov  
 P70032

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.